

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Southern Division)

DONALD GRIFFIN  
12203 Parkton Court  
Fort Washington Maryland 20747

Plaintiff

vs.

YASMEEN AALIYA WEBB  
3012 25th Street  
Washington, D.C. 20018

Defendant

\* Complaint  
\* Civil Action No.  
\*  
\* JURY TRIAL DEMANDED  
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JURISDICTION IN THE FEDERAL COURT (Applicable to All Counts)

Donald Griffin, Plaintiff, by Brian Bennett, his attorney, sues Yasmeen Aaliya Webb, Defendant, and respectfully states as follows:

PREAMBLE

1. The Plaintiff, Donald Griffin, is a resident of Prince George's County, State of Maryland.

2. Yasmeen Aaliya Webb is a resident of Washington, D.C.

3. This action involves a collision between a motor vehicle owned and operated by the Plaintiff, Donald Griffin, and a motor vehicle owned and operated by the Defendant, Yasmeen Aaliya Webb.

4. That collision occurred on the Dwight D. Eisenhower SW freeway, I-395, a public highway in Washington, D.C.

5. The amount in controversy, exclusive of interest and costs, exceeds \$75,000.00.

6. Jurisdiction exists under Title 28 USCA Section 1332 based upon diversity of citizenship.

STATEMENT OF FACTS

7. On or about October 1, 2024, the Plaintiff, Donald Griffin, was carefully and prudently operating his motor vehicle westbound on I-395, the Dwight D. Eisenhower SW Freeway, approaching Exit 4B in Washington, D.C., and slowing for traffic, when a motor vehicle being operated by the Defendant, Yasmeen Aaliya Webb, rearended and struck the Plaintiff's motor vehicle, thereby causing a collision.

8. The owner of the vehicle operated by the Defendant, Yasmeen Aaliya Webb, at all times relevant hereto, was the Defendant, Yasmeen Aaliya Webb.

STATEMENT OF NEGLIGENCE

9. The collision was caused by the recklessness, carelessness and negligence of the Defendant, Yasmeen Aaliya Webb.

10. The Defendant was negligent in that he:

- a. Failed to maintain a proper control over the motor vehicle;
- b. Failed to maintain a proper lookout for oncoming traffic;
- c. Failed to yield the right-of-way;
- d. Failed to reduce speed to avoid a collision;
- e. Operated the motor vehicle at a rate of speed excessive for the conditions then and there existing;
- f. And in other respects operated, managed and controlled her motor vehicle in a careless, dangerous and negligent manner under the circumstances then and there existing.

COUNT I

The Plaintiff, Donald Griffin, realleges, reaffirms and incorporates by reference the hereinabove allegations of fact and sues the Defendant, Yasmeen Aaliya Webb, and states:

11. As a direct and proximate result of the negligence and carelessness of the Defendant, the Plaintiff, Donald Griffin:

a. Suffered serious, painful and possibly permanent bodily injuries, great physical pain and mental anguish, severe and substantial emotional distress, and loss of the capacity for the enjoyment of life;

b. Was, is and will be required to undergo medical treatment and to incur medical costs and expenses in order to alleviate his injuries, pain and suffering;

c. Was and is precluded from engaging in his normal activities and pursuits;

d. Suffered damage to his property, including his motor vehicle;

e. Suffered the loss of earnings;

f. And otherwise was hurt, injured and caused to sustain losses.

12. All of the Plaintiff's losses were, are and will be due solely and by reason of the recklessness, carelessness and negligence of the Defendant.

13. None of the Plaintiff's losses were due to any negligence or want of due care on his part contributing to them.

WHEREFORE, the Plaintiff, Donald Griffin, sues the Defendant,

Yasmeen Aaliya Webb, and demands in excess of Seventy Five Thousand Dollars (\$75,000.00, **plus**) damages.

  
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Brian Bennett

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(410) 687-4744(fax)  
Attorney for Plaintiff  
(Federal Bar No. 04543)

PRAYER FOR JURY TRIAL

The Plaintiff, Donald Griffin, elects to have his case tried by a jury.

  
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Brian Bennett